

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE	:	CHAPTER 7
	:	
LENA CHRISTINE JENKINS-SMITH,	:	CASE NO. 20-62899-BEM
	:	
Debtor.	:	
	:	
— — — — —	:	— — — — —
	:	

**MOTION OF SUNTRUST BANK NOW TRUIST BANK**  
**TO EXTEND TIME**  
**FOR FILING COMPLAINT TO DETERMINE**  
**DISCHARGEABILITY OF DEBT PURSUANT TO**  
**11 U.S.C. §523 AND/OR COMPLAINT OBJECTING**  
**TO DISCHARGE PURSUANT TO 11 U.S.C. §727**

NOW COMES Suntrust Bank now Truist Bank ("Movant") and moves the Court as follows:

1.

Movant is a creditor of Debtor ("Debtor") and holds a judgment on defaulted line of credit.

2.

Movant is currently investigating the loan transaction with Debtor, and matters which may affect the administration of the Debtor's estate and the Debtor's right to a discharge. Movant is engaged in discovery at this time. The investigation is ongoing and requires further inquiry.

3.

It may be appropriate for Movant to bring an action to declare the indebtedness owing to Movant nondischargeable if it is determined, inter alia, that Debtors committed actual fraud

or false pretenses in connection with the loan transaction. It may be warranted to bring a complaint objecting to Debtor's discharge in this case.

4.

In order to have the necessary facts with which to formulate an appropriate Complaint to Determine Dischargeability and/or Objecting to Debtor's Discharge, it is necessary for Movant to continue its investigation into the actions of Debtor as they relate to Movant and this case.

5.

This request is made within the time set to file such complaints.

6.

Debtor consents to the extension of time requested.

WHEREFORE, Movant moves this Court to extend the time within which it may file a Complaint Objecting to the Discharge of the Indebtedness owing to it and the time within which it may file a Complaint Objecting to the Debtor's Discharge through and including August 31, 2020.

This 11th day of May, 2020.

The Law Office of  
LEFKOFF, RUBIN, GLEASON & RUSSO, P.C.  
Attorney for Movant

By: \_\_\_\_\_/s/\_\_\_\_\_  
Craig B. Lefkoff  
Georgia State Bar No. 445045

5555 Glenridge Connector  
Suite 900  
Atlanta, Georgia 30342  
(404) 869-6900

**CERTIFICATE OF SERVICE**

The undersigned, Craig B. Lefkoff, hereby certifies that I am, and at all times hereinafter mentioned, was more than 18 years of age, and that I served copies of the foregoing MOTION OF SUNTRUST BANK NOW TRUIST BANK TO EXTEND TIME FOR FILING COMPLAINT TO DETERMINE DISCHARGEABILITY OF DEBT PURSUANT TO 11 U.S.C. SECTION 523 AND/OR COMPLAINT OBJECTION TO DISCHARGE PURSUANT TO 11 U.S.C. SECTION 727 and proposed CONSENT ORDER on Debtor, Debtor's counsel; and the Chapter 7 Trustee by depositing same in the United States Mail in properly addressed envelopes with adequate postage at:

Lena Christine Jenkins-Smith  
981 Moores Walk Lane  
Suwanee, Georgia 30024

Robert Scott Rickman, Esq.  
Rickman & Associates, PC  
Suite 200  
1755 North Brown Road  
Lawrenceville, Georgia 30043

S. Gregory Hays  
Hays Financial Consulting, LLC  
Suite 555  
2964 Peachtree Road  
Atlanta, Georgia 30305

Office of the United States Trustee  
362 Richard Russell Building  
75 Ted Turner Drive, SW  
Atlanta, Georgia 30303

This 11<sup>th</sup> day of May, 2020.

The Law Office of  
LEFKOFF, RUBIN, GLEASON & RUSSO, P.C.  
Attorney for Movant

By: \_\_\_\_\_/s/\_\_\_\_\_  
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